

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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| <p>TIMOTHY KING, MARIAN ELLEN<br/>SHERIDAN, JOHN EARL HAGGARD,<br/>CHARLES JAMES RITCHARD, JAMES<br/>DAVID HOOPER and DAREN WADE<br/>RUBINGH,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>GRETCHEN WHITMER, in her official<br/>capacity as Governor of the State of<br/>Michigan, JOCELYN BENSON, in her<br/>official capacity as Michigan Secretary of<br/>State and the Michigan BOARD OF STATE<br/>CANVASSERS,</p> <p style="text-align: center;">Defendants</p> <p style="text-align: center;">and</p> <p>CITY OF DETROIT, DEMOCRATIC<br/>NATIONAL COMMITTEE and<br/>MICHIGAN DEMOCRATIC PARTY,</p> <p style="text-align: center;">Intervenor-Defendants.</p> | <p>No. 2:20-cv-13134</p> <p>Hon. Linda V. Parker</p> |
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**THE CITY OF DETROIT’S EX PARTE MOTION  
TO EXTEND PAGE LIMIT**

Intervenor-Defendant the City of Detroit (the “City”), by and through counsel, respectfully requests leave to file its Motion for Sanctions, for Disciplinary Action, for Disbarment Referral and for Referral to State Bar Disciplinary Bodies in excess of the 25-page limit. In support of this request, the City states:

1. The City seeks to file a Motion for Sanctions, for Disciplinary Action, for Disbarment Referral and for Referral to State Bar Disciplinary Bodies.

2. Pursuant to Local Rule 7.1(d)(3), a brief supporting a motion may not exceed 25 pages. However, the Rule permits parties to apply *ex parte* to file a longer brief. Moreover, this Court has encouraged parties to request a page limit extension “[w]hen page limits are inadequate for a party’s needs ....” *Elhady v. Bradley*, 438 F. Supp. 3d 797, 821 n. 11 (E.D. Mich. 2020).

3. The City requests leave to file a 38-page brief in order to address the full scope of legal and factual issues raised in the Motion.

4. The City has limited the length of the brief without sacrificing clarity and/or its ability to address the factual and legal issues supporting its Motion. However, due to the number of factual and legal issues needing to be addressed, the City has been unable to limit the brief to 25 pages.

WHEREFORE, the City respectfully requests that this Court permit it to file a 38-page brief in support of its Motion for Sanctions, for Disciplinary Action, for Disbarment Referral and for Referral to State Bar Disciplinary Bodies.

Dated: January 5, 2021

Respectfully submitted,

**FINK BRESSACK**

By: /s/ David H. Fink  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2021, I electronically filed the foregoing paper with the Clerk of the court using the electronic filing system, which sends notice to all counsel of record.

FINK BRESSACK

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